

1 Malani Dale Kotchka-Alanes  
2 Nevada Bar No. 13168  
3 E-Mail: [mkotchkaalanes@lrrc.com](mailto:mkotchkaalanes@lrrc.com)  
4 **Lewis Roca Rothgerber Christie LLP**  
5 3993 Howard Hughes Parkway, Suite 600  
6 Las Vegas, Nevada 89169-5996  
7 Tel: (702) 949-8258  
8 Fax: (702) 949-8398

9 *Attorney for Plaintiff Charon L. Brown*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 CHARON L. BROWN,

13 Plaintiff,

14 vs.

15 OFFICER MECHAM, et al.,

16 Defendants.

CASE NO.: 2:15-CV-01670-APG-NJK

**STIPULATION TO EXTEND RULE 60  
MOTION DEADLINE (SECOND REQUEST)**

17 Former Defendant NaphCare, Inc. (“NaphCare”), and Plaintiff Charon Brown stipulate as follows:

- 18 1. Whereas the Court granted NaphCare’s original motion to dismiss on June 1, 2016 (ECF No. 22 (Order Granting ECF No. 12));
- 19 2. Whereas Malani Dale Kotchka-Alanes was appointed as pro bono counsel for Plaintiff Charon Brown on March 28, 2017;
- 20 3. Whereas Plaintiff issued a subpoena for NaphCare to testify at a deposition scheduled for May 30, 2017;
- 21 4. Whereas Plaintiff and NaphCare agreed to reschedule the deposition to accommodate the parties’ and counsels’ schedules;
- 22 5. Whereas Plaintiff and NaphCare previously stipulated to extend the Rule 60 motion deadline to July 13, 2017, which the Court granted (ECF Nos. 111 and 112);
- 23 6. Whereas the 30(b)(6) deposition of NaphCare will not be able to take place until later than

1 anticipated due to the travel and work schedules of (1) NaphCare's 30(b)(6) witness, (2)  
2 NaphCare's counsel, and (3) counsel for Las Vegas Metropolitan Police Department  
3 Defendants Mecham, Kegley, and Sands;

- 4 7. Therefore, NaphCare and Plaintiff agree to extend the Rule 60 motion deadline to August  
5 11, 2017.

6 Dated this 14th day of June, 2017.

7 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

8 By: /s/ Malani Dale Kotchka-Alanes

9 MALANI DALE KOTCHKA-ALANES

10 Nevada Bar No. 13168

3993 Howard Hughes Pkwy., Suite 600

11 Las Vegas, NV 89169-5996

12 *Attorney for Plaintiff Charon L. Brown*

13 **ALVERSON, TAYLOR, MORTENSEN &  
14 SANDERS**

15 By: /s/ Michael T. McLoughlin

16 MICHAEL T. MCLOUGHLIN

17 Nevada Bar No. 012820

18 SHIRLEY BLAZICH

19 Nevada Bar No. 008378

7401 W. Charleston Blvd.

20 Las Vegas, NV 891117

21 *Attorneys for Former Defendant NaphCare, Inc.*

22 **IT IS SO ORDERED:**

23   
UNITED STATES MAGISTRATE JUDGE

24 Dated: June 15, 2017